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5 Attorneys for Defendant X CORP., as  
successor in interest to first named  
6 Defendant Twitter, Inc.

7  
8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10 **SAN FRANCISCO DIVISION**

11 Facilitate Corporation Pte Ltd,  
12 Plaintiff,

13 v.  
14

15 Twitter, Inc. and X Corp., Inc,  
16 Defendants.

No. 4:23-cv-3242-YGR

**DECLARATION OF [REDACTED]**  
**IN SUPPORT OF ADMINISTRATIVE**  
**MOTION TO FILE UNDER SEAL**

**DECLARATION OF** [REDACTED]

I [REDACTED] declare as follows

1. I am currently [REDACTED] a wholly-owned subsidiary of X Holdings Corp. ("X Holdings"). In my role, I have acquired personal knowledge of X Holdings' owners/shareholders and X Holdings' policy relating to the confidentiality of its business and financial information, including the identities of its owners/shareholders. The facts set forth in this declaration are true and correct to the best of my knowledge, information, and belief, and are based on my personal knowledge and/or information to which I have access.

2. I submit this declaration in support of the Administrative Motion to File Under Seal, filed by Defendant X Corp., as successor in interest to second named Defendant Twitter, Inc. ("Twitter") in *Facilitate Corporation Pte Ltd v. Twitter, Inc. et al.*, No. 4:23-cv-03242-YGR.

3. The owners/shareholders of X Holdings include various individual persons, private family and other trusts, and other private entities (such as funds, LLCs and corporations). As a matter of routine practice and policy, X Holdings does not publish or make publicly available information regarding its owners/shareholders and treats such information as confidential. Individuals and entities investing and taking an ownership interest in a private corporation such as X Holdings expect that such information will remain private. The disclosure of such information violates this expectation of privacy. Also, in certain cases, X Holdings is contractually bound to keep such information confidential.

4. The wholesale disclosure of information regarding its owners/shareholders potentially could enable X Holdings' competitors to undermine X Holdings' competitive position in the marketplace, allow current or prospective business partners or counterparties to take unfair advantage of X Holdings in negotiations or other business affairs, or otherwise prejudice X Holdings' business interests. To that end, X Holdings has policies that prohibit employees from accessing information beyond what is reasonably necessary to perform their duties, limiting access to certain non-public information, permitting access to documents and data on a need-to-know basis, and requiring employees to sign confidentiality agreements.

1           5.       I understand that the Twitter's Administrative Motion to File Under Seal requests  
2 that the Court maintain information regarding the identities of X Holdings' owners/shareholders  
3 under seal. This information is private and confidential, and the disclosure of such information  
4 would be injurious to the owners/shareholders for the reasons stated above.

5           6.       I also understand that X Corp.'s Administrative Motion to File Under Seal  
6 requests that the Court maintain under seal certain identifying information contained in this  
7 declaration. I may face threats, harassment, and an invasion of privacy if my identity were  
8 disclosed, and the disclosure of such identifying information would be injurious to me for those  
9 reasons.

10               I declare under penalty of perjury that the foregoing is true and correct. Executed  
11 on September <sup>9/20/2023</sup> \_\_, 2023 in [REDACTED]

12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]  
26 [REDACTED]  
27 [REDACTED]  
28 [REDACTED]